

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA
CRIMINAL DIVISION

VENUE: SAN FRANCISCO

CR 07 0454

UNITED STATES OF AMERICA,

v.

SHANNON BLAYLOCK,
a/k/a ARLANDYS RICHARDSON,
a/k/a "DADDY RICH,"
TAWAKONI SEATON,
a/k/a "TONI," and
LATOSHA GARDNER

DEFENDANT.

INDICTMENT

18 U.S.C. § 371 - Conspiracy to Engage in Sex
Trafficking of a Minor;
18 U.S.C. § 1591 - Sex Trafficking of a Minor

A true bill.

Thomas J. Ball
Foreman

Filed in open court this 17th day of July, 2007

Wiley H
Clerk

Bail, \$ No bail warrant as to each defendant

PJH

FILED
07 JUL 17 PM 4:09
RICHARD W. WILKINS
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING**OFFENSE CHARGED**

SEE ATTACHMENT

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY:

SEE ATTACHMENT

PROCEEDINGName of Complainant Agency, or Person (& Title, if any)
Federal Bureau of Investigation☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. Att'y ☐ Defense☐ this prosecution relates to a pending case involving this same defendant☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded underSHOW
DOCKET NO.MAGISTRATE
CASE NO.Name and Office of Person
Furnishing Information on
THIS FORM**SCOTT N. SCHOOLS**☒ U.S. Att'y ☐ Other U.S. AgencyName of Asst. U.S. Att'y
(if assigned)**MICHELLE MORGAN-KELLY, AUSA****FILED**Name of District Court, and/or Judge/Magistrate Location
NORTHERN DISTRICT OF CALIFORNIA

07 JUL 17 PM 4:08

DEFENDANT NO. 1
RICHARD W. HILL
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

TAWAKONI SEATON a/k/a "TONI"

DISTRICT COURT NUMBER

CR 07 0454**PJH****DEFENDANT****IS NOT IN CUSTODY**1) ☒ Has not been arrested, pending outcome this proceeding.
If not detained give date any prior summons was served on above charges2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction6) ☐ Awaiting trial on other charges☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of Institution

Has detainer
been filed?☐ Yes
☐ NoIf "Yes"
give date
filed**DATE OF
ARREST**

Month/Day/Year

Or... If Arresting Agency & Warrant were not

**DATE TRANSFERRED
TO U.S. CUSTODY**

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☐ NO PROCESS*☒ WARRANTBail Amount: NO BAIL

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

PENALTY SHEET ATTACHMENT
TAWAKONI SEATON
a/k/a "TONI"

VIOLATIONS

COUNT ONE:

18 U.S.C. § 371 - Conspiracy to Engage in Sex Trafficking of a Minor

COUNT TWO:

18 U.S.C. § 1591 - Sex Trafficking of a Minor

PENALTIES

COUNT ONE: 5 years imprisonment; \$250,000 fine; 3 years supervised release; and \$100 special assessment

COUNT TWO: 10 year mandatory minimum sentence, lifetime imprisonment maximum sentence, \$250,000 fine, lifetime supervised release; and \$100 special assessment

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SEAL
BY COURT ORDER**CR****FILED**

07 JUL 17 PM 4:08

Name of District Court, and/or Judge/Magistrate Location
NORTHERN DISTRICT OF CALIFORNIADEFENDANT MISSING
RICHARDSON
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SHANNON BLAYLOCK a/k/a ARLANDYS RICHARDSON

DISTRICT COURT NUMBER

07**0454****PJH****PROCEEDING**Name of Complainant Agency, or Person (& Title, if any)
Federal Bureau of Investigation☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCP 20, 21 or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. Att'y ☐ Defense☐ this prosecution relates to a pending case involving this same defendant☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded underSHOW
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CASE NO.Name and Office of Person
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(if assigned)

MICHELLE MORGAN-KELLY, AUSA

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- 3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

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Comments:

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a/k/a ARLANDYS RICHARDSON
a/k/a "DADDY RICH"

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(if assigned)**MICHELLE MORGAN-KELLY, AUSA**

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

07 JUL 17 PM 4:08

FILED
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

LATOSHA GARDNER

DISTRICT COURT NUMBER

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If "Yes" give date filed

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Before Judge:

Comments:

PENALTY SHEET ATTACHMENT
LATOSHA GARDNER

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SCOTT N. SCHOOLS (SCBN 9990)
United States Attorney

FILED

07 JUL 17 PM 4:09

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

~~SEALED~~
~~BY COURT ORDER~~

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

No. 0454 PJH

Plaintiff,

v.

SHANNON BLAYLOCK,
a/k/a ARLANDYS RICHARDSON,
a/k/a "DADDY RICH,"
TAWAKONI SEATON,
a/k/a "TONI," and
LATOSHA GARDNER,

Defendants.

VIOLATIONS: 18 U.S.C. § 371 -
Conspiracy to Engage in Sex Trafficking of
a Minor; 18 U.S.C. § 1591 - Sex Trafficking
of a Minor

SAN FRANCISCO VENUE

INDICTMENT

The Grand Jury charges:

COUNT ONE: (18 U.S.C. § 371 - Conspiracy)

1. From in or about February 2007, to on or about March 22, 2007, in the Northern
District of California, the defendants,

SHANNON BLAYLOCK,
a/k/a Arlandys Richardson,
a/k/a "Daddy Rich,"
TAWAKONI SEATON,
a/k/a "Toni," and
LATOSHA GARDNER,

did knowingly conspire to commit an offense against the United States, namely, sex trafficking

INDICTMENT

18

1 of a 17-year-old minor female, V.S., in violation of Title 18, United States Code, Section 1591.

2 2. In furtherance of the conspiracy and to attain the objects thereof, defendants committed
3 the following overt acts in the Northern District of California and elsewhere:

4 a. On or about March 7, 2007, BLAYLOCK and SEATON arranged and
5 paid for V.S. to travel by bus from Baton Rouge, Louisiana, to San Francisco, California.

6 b. On or about March 10, 2007:

7 (1) BLAYLOCK and GARDNER picked up V.S. at a Greyhound bus
8 station in San Francisco and took her to GARDNER's residence.

9 (2) GARDNER helped V.S. with her hair and makeup so that V.S.
10 could work as a prostitute.

11 (3) BLAYLOCK reserved a room under the name ARLANDYS
12 RICHARDSON at the Residence Inn in South San Francisco using SEATON's email address in
13 the customer information, intending that V.S. would engage in prostitution there.

14 c. On or about March 11, 2007, BLAYLOCK reserved a room under the
15 name ARLANDYS RICHARDSON at the Doubletree Hotel in South San Francisco, intending
16 that V.S. would engage in prostitution there.

17 d. On or about March 12, 2007, BLAYLOCK reserved a room under the
18 name ARLANDYS RICHARDSON at the Best Western in South San Francisco, using
19 SEATON's telephone number in the customer information, intending that V.S. would engage in
20 prostitution there.

21 e. On or about March 13, 2007, BLAYLOCK reserved a room under the
22 name ARLANDYS RICHARDSON at the Travelodge in South San Francisco using SEATON's
23 telephone number in the customer information, intending that V.S. would engage in prostitution
24 there.

25 f. On or about March 14, 2007, BLAYLOCK reserved a room under the
26 name ARLANDYS RICHARDSON at the Good Nite Inn in South San Francisco, using
27 SEATON's telephone number in the customer information, intending that V.S. would engage in
28 prostitution there.

1 g. On or about March 16, 2007, BLAYLOCK reserved a room under the
2 name ARLANDYS RICHARDSON at the Good Nite Inn in South San Francisco, knowing that
3 V.S. would engage in prostitution there.

4 i. On or about March 18, 2007, a room was reserved at the Good Nite Inn in
5 South San Francisco with the billing name of SEATON, with the intent that V.S. would engage
6 in prostitution there.

7 j. On or about March 20, 2007, BLAYLOCK used the billing name
8 ARLANDYS RICHARDSON at the Good Nite Inn in South San Francisco, using SEATON's
9 telephone number in the customer information, intending that V.S. would engage in prostitution
10 there.

11 k. On or about March 20, 2007, GARDNER rented a car from Enterprise
12 RentACar, which BLAYLOCK used to transport V.S. and to pick up money from V.S.

13 l. From on or about March 10, 2007 until on or about March 22, 2007:

14 (1) SEATON received telephone calls from an Internet advertisement
15 SEATON had posted advertising V.S. as an escort, and in response to those calls, SEATON
16 arranged prostitution calls for V.S. at various hotels in South San Francisco.

17 (2) BLAYLOCK regularly met with V.S. and took from her the money
18 that V.S. earned on prostitution calls at various hotels in South San Francisco.

19 (3) BLAYLOCK regularly took V.S. to GARDNER's residence to
20 spend time between prostitution calls.

21 All in violation of Title 18, United States Code, Section 371.

22 COUNT TWO: (18 U.S.C. § 1591 - Sex Trafficking of a Minor)

23 From in or about February 2007, to on or about March 22, 2007, in the Northern District
24 of California, the defendants,

25 SHANNON BLAYLOCK,
26 a/k/a Arlandys Richardson,
27 a/k/a "Daddy Rich,"
28 TAWAKONI SEATON,
 a/k/a "Toni," and
 LATOSHA GARDNER,

1 did knowingly, and in and affecting interstate commerce, recruit, entice, harbor, transport,
2 provide, and obtain by any means a person, namely, a 17-year-old minor female, V.S., and did
3 benefit financially and by receiving anything of value from participation in a venture that had
4 engaged in such acts, knowing that V.S. had not attained the age of 18 years and would be caused
5 to engage in a commercial sex act, all in violation of Title 18, United States Code, Section 1591.

6 DATED: July 17, 2007

A TRUE BILL.

8
9 
FOREPERSON

10 SCOTT N. SCHOOLS
11 United States Attorney

12
13 
14 W. DOUGLAS SPRAGUE
Acting Chief, Criminal Division

15
16 (Approved as to form: 
AUSA MORGAN-KELLY